

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

EDWARD A. FRIEDMAN,

Plaintiff,

vs.

PRUDENTIAL INSURANCE
COMPANY OF AMERICA,

Defendant.

Civil Action No.:07-CIV-9620

To: Michael E. Quiat
Uscher, Quiat, Uscher & Russo, P.C.
433 Hackensack Avenue, 2nd Floor
Hackensack, NJ 07601

Attorney for Plaintiff

NOTICE OF MOTION FOR ADMISSION *PRO HAC VICE*

PLEASE TAKE NOTICE that upon the annexed Affidavits of Jeremy P. Blumenfeld and Brian A. Herman in support of this Motion and the Certificate of Good Standing annexed thereto, we will move this Court at the United States Courthouse for the Southern District of New York, pursuant to Rule 1.3(c) of the Local Rules of the United States District Court for the Southern District of New York, for an Order allowing the admission of Jeremy P. Blumenfeld, a Partner of the firm of MORGAN, LEWIS & BOCKIUS LLP and a member in good standing of the highest courts of the states of Pennsylvania, New Jersey and Ohio, attorney *pro hac vice* to argue or try these proceedings in whole or in part.

FILED
U.S. DISTRICT COURT
S.D. OF N.Y.
2008 JAN 24 PM 1:18

639073 #25 1-24-08 126

Respectfully submitted,

MORGAN LEWIS & BOCKIUS LLP
Attorneys for Prudential Insurance Company of
America



By:

Brian A. Herman
MORGAN LEWIS & BOCKIUS LLP
101 Park Avenue
New York, NY 10178
Telephone: (212) 309-6000
Facsimile: (212) 309-6001

Dated: January 23, 2008

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

EDWARD A. FRIEDMAN,

Plaintiff,

vs.

PRUDENTIAL INSURANCE
COMPANY OF AMERICA,

Defendant.

Civil Action No.:07-CIV-9620

ORDER GRANTING ADMISSION TO PRACTICE *PRO HAC VICE*

The motion for admission to practice *pro hac vice* in the above-captioned matter is granted. The admitted attorney, Jeremy P. Blumenfeld, is permitted to argue or try this particular case in whole or in part as counsel or advocate.

An attorney admitted to practice *pro hac vice* is required to pay a \$25.00 attorney admission fee and present this Order to the intake deputy clerk in the Clerk's Office. When paying by mail, return a copy of this Order to the Clerk's Office with the required fee.

This Order confirms the appearance of Jeremy P. Blumenfeld as counsel in this case, and it will be entered on the Court's docket. A notation of counsel's admission *pro hac vice* for the above listed case will be made on the roll of attorneys.

The attorney admitted *pro hac vice* must serve a copy of this Order on all other counsel in this case.

Honorable Sidney H. Stein, U.S.D.J.
United States District Court for the Southern
District of New York

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

EDWARD A. FRIEDMAN,

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Civil Action No.:07-CIV-9620

**AFFIDAVIT OF JEREMY P. BLUMENFELD IN SUPPORT OF
MOTION TO ADMIT COUNSEL *PRO HAC VICE***

JEREMY P. BLUMENFELD, being duly sworn, hereby deposes and says as follows:

1. I am a Partner with the law firm of Morgan, Lewis & Bockius LLP.
2. I submit this affidavit in support of my motion for admission to practice *pro hac vice* in the above-captioned action.
3. As shown in the Certificate of Good Standing annexed hereto, I am a member in good standing of the highest court of Pennsylvania.
4. I am also a member in good standing of the highest courts of the states of Ohio and New Jersey.
5. There are no pending disciplinary proceedings against me in any State or Federal court.
6. I have read and am familiar with (a) the provisions of the Judicial Code (Title 28, U.S.C.) which pertain to the jurisdiction of, and practice in, the United States District Courts; (b) the Federal Rules of Civil Procedure; (c) the Federal Rules of Criminal Procedure; (d) the

Federal Rules of Evidence; (e) the Local Rules of the United States District Court for the Southern and Eastern Districts of New York; and (f) the New York State Lawyer's Code of Professional Responsibility as adopted from time to time by the Appellate Divisions of the State of New York.

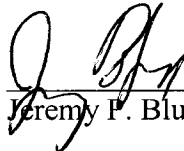
7. Defendant Prudential Insurance Company of America has requested that I represent them in this matter. I am familiar with Prudential's operations and have experience in the area of law involving labor and employment, having specialized in such issues in my practice. I have acted as counsel for other clients in matters concerning such issues throughout the course of my practice.

8. I respectfully submit that there is good cause for my admission *pro hac vice*.

9. I agree to abide by all rules governing this Court, including disciplinary rules.

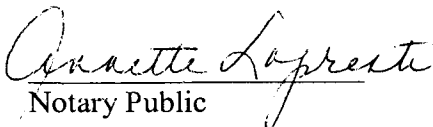
10. I will immediately notify the Court of any matter affecting my standing at the bar of any other Court.

WHEREFORE, affiant respectfully requests that she be permitted to appear as counsel and advocate *pro hac vice* in this action.

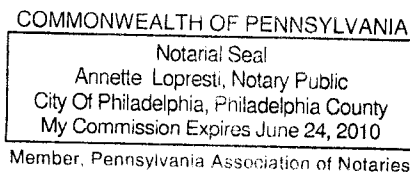


Jeremy P. Blumenfeld

Subscribed and sworn to before me
this 23rd of January, 2008



Annette Lopresti
Notary Public





Supreme Court of Pennsylvania

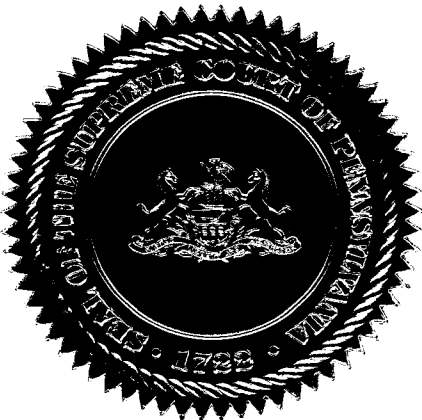
CERTIFICATE OF GOOD STANDING

Jeremy P. Blumenfeld, Esq.

DATE OF ADMISSION

October 27, 2000

The above named attorney was duly admitted to the bar of the Commonwealth of Pennsylvania, and is now a qualified member in good standing.



Witness my hand and official seal

Dated: January 23, 2008

A handwritten signature in black ink, appearing to read "Patricia A. Johnson", written over a horizontal line.

Patricia A. Johnson
Chief Clerk

UNITED STATES DISTRICT COURT
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EDWARD A. FRIEDMAN,

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vs.

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Defendant.

Civil Action No.:07-CIV-9620

**AFFIDAVIT OF BRIAN A. HERMAN IN SUPPORT OF
MOTION TO ADMIT COUNSEL *PRO HAC VICE***

BRIAN A. HERMAN, being duly sworn, hereby deposes and says as follows:

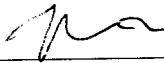
1. I am a Partner at the firm of Morgan, Lewis & Bockius LLP, counsel for Defendant Prudential Insurance Company of America ("Defendant") in the above captioned matter. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Defendant's motion to admit Jeremy P. Blumenfeld as counsel *pro hac vice* to represent Defendants in this matter.
2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law in 1999. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.
3. Jeremy and I became partners together in October 2006.
4. I have found Mr. Blumenfeld to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Procedure.

5. I respectfully submit a proposed order granting the admission of Jeremy P.

Blumenfeld, *pro hac vice*, which is attached hereto as Exhibit A.

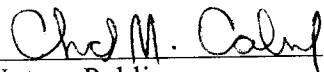
WHEREFORE, affiant respectfully requests that the motion to admit Jeremy P.

Blumenfeld, *pro hac vice*, to represent Defendants in the above captioned matter, be granted.



Brian A. Herman

Subscribed and sworn to before me
this 23rd of January, 2008



Notary Public

CHARLES M. CALVARUSO
Notary Public, State of New York
No. 31-4818473
Qualified in New York County
Commission Expires August 31, 2010

CERTIFICATE OF SERVICE

The undersigned, an attorney, hereby certifies that a true and correct copy of the Notice of Motion for Admission *Pro Hac Vice* of Jeremy P. Blumenfeld, with supporting papers and proposed Order were served by regular mail on this day to:

Michael E. Quiat
Uscher, Quiat, Uscher & Russo, P.C.
433 Hackensack Avenue, 2nd Floor
Hackensack, NJ 07601



Brian A. Herman

Dated: January 24, 2008